

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: EHSAN ULLAH KHAN , aka	:	Chapter: 13
Ehsan Khan, aka Ehsan U. Khan, and	:	Case No.: 19-10715-elf
MISBAH EHSAN KHAN , aka	:	
Misbah Khan, aka Misbah E. Khan,	:	
Debtors	:	

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN**, by and through their attorneys, FISHER CHRISTMAN, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.
3. Denied. Debtors' Chapter 13 Plan is feasible. As Debtors' residence has a value (\$320,000) less than the balance on the first mortgage (Proof of Claim No. 15: \$436,158.23) the junior mortgage (Proof of Claim No. 30) is subject to avoidance. As Debtors' children get older, Joint Debtor's income will increase, allowing future increases in Plan payments. Additionally, Debtors' have a car with a lien that is nearly paid in full.
4. Denied to the extent the averments of paragraph 4 are other than a statement or conclusion of law or misplaced request for relief that does not require a response.

WHEREFORE, Debtor(s) **EHSAN ULLAH KHAN** and **MISBAH EHSAN KHAN** respectfully prays this Honorable Court for an Order than the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

By: /s/ J. Zac Christman
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